

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA)	
)	
Petitioner,)	
)	
v.)	Civil Case No. 25-mc-00011 (ADC-GLS)
)	
ANA IZQUIERDO,)	
)	
Respondent.)	

RESPONSE TO PETITIONER’S MOTION FOR A HEARING

Respondent, by and through her undersigned counsel, and in response to the United States’ Motion to Schedule Hearing (Doc. 36) (the “Motion”), respectfully suggests that this Court not schedule a hearing at this time, for the following reasons:

1. On April 30, 2025, Petitioner filed the Motion asking the Court to schedule a hearing in this case prior to May 19, 2025. The Motion reported that one of Petitioner’s attorneys, Mr. Pahl, is scheduled to start a temporary assignment to a different Department of Justice (“DOJ”) office on that date.
2. As an initial matter, Respondent notes that the Motion did not specify the kind of hearing being requested, the purpose of the hearing, the matter(s) to be discussed at the hearing, or anything else to indicate what Petitioner would like done or addressed at the requested hearing. Respondent respectfully suggests that this Court cannot productively evaluate Petitioner’s request unless and until Petitioner provides the Court (and Respondent) with an explanation as to the goals or desired outcomes of the requested hearing.
3. Moreover, Petitioner respectfully suggests that a hearing at this point would derail the logical, step-by-step approach for resolving this matter articulated by the Court during the

April 15, 2025, status conference. Specifically, Respondent understood the Court to state that the Court intended to first rule upon Respondent's pending Motion to Dismiss. If the Court denies that motion, then it was Respondent's further understanding that the Court would then move forward to a determination of the best procedural manner by which the parties would present information to the Court. During the status conference, Respondent respectfully suggested that it would be most appropriate and most efficient for the Court to accept written submissions prior to a hearing, as such submissions would assist the Court in determining the need for and scope of the hearing.

4. Finally, Respondent respectfully suggests that the reason proffered by Petitioner in asking for a hearing at this time does not justify the relief sought. Mr. Pahl's reassignment to a different office within the DOJ simply is not sufficient grounds to disrupt the procedures outlined by the Court for resolving this matter. Respondent respectfully points out that another government attorney, the Assistant United States Attorney, has been entered in this case for a longer period of time than has Mr. Pahl. Moreover, Respondent respectfully believes that if the government wishes for a lawyer from DOJ to also be involved in this case, then DOJ can assign someone to the matter who, Respondent respectfully submits, would have little difficulty getting up to speed on the case.

WHEREFORE, Respondent respectfully requests that this Court deny the Motion.

Date: May 7, 2025.

Respectfully submitted,

NEILL SCHWERIN BOXERMAN, P.C.

By: /s/ Michelle F. Schwerin

Sanford J. Boxerman #34736MO

Michelle Feit Schwerin #62882MO

120 S. Central Avenue, Ste 725

St. Louis, MO 63105

Telephone: (314) 949-1864

Facsimile: (314) 949-1864

boxerman@nsbpc.com

schwerin@nsbpc.com

MBA LAW

By: /s/ Mayte Bayolo-Alonso

Mayte Bayolo-Alonso USDC No. 308109

PO Box 11204

San Juan, PR 00910

Telephone: (787)448-5544

maytebayololaw@gmail.com